



Client: Country Homes and Gardens plc

**Independent Examination of the South Wiltshire Core
Strategy Review Development Plan Document**

**Written Statement in Response to the Issues for
Examination Identified by the Inspector**

**Issue 2: Evidence Supporting Revised Housing
and Employment Figures**

July 2011



REPORT CONTROL

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Primary Author	Jeremy Heppell	Initialled:
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Contributor		Initialled:
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Review By	Martin Hawthorne	Initialled:
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1.0 ISSUE 2: EVIDENCE SUPPORTING REVISED HOUSING AND EMPLOYMENT FIGURES

1.1 *What evidence is there to support the revised housing and employment figures now being proposed by the Council?*

1.2 *How robust is that evidence as compared to the evidence supporting the emerging Regional Strategy?*

1.3 Fundamentally, the revised housing figures demonstrate a lack of ambition which is at odds with the Government's Statement on Planning for Growth and the draft National Planning Policy Framework, both of which urge local planning authorities to take every opportunity to plan for economic growth.

1.4 The Regional Spatial Strategy took a long term view of housing and employment requirements to 2026, a period over which it is expected that there will be periods of economic growth alongside periods of relative stagnation. Such long term planning is essential if the UK economy is to continue to grow.

1.5 The Council's approach on the other hand is predicated on projections from the current downturn, and moves away from projections derived from the previous period when the economy was growing robustly. This approach is unduly negative and at odds with the approach that the Council should be promoting.

1.6 There is a suggestion that a higher housing target is unlikely to be achievable given that it represents a significant increase on delivery levels from when the housing market was buoyant. Has this assertion been tested, particularly with reference to housebuilders themselves? We can see little justification for artificially constraining housing targets based solely on past performance.



- 1.7 Most fundamentally, the Council's approach has scant regard for the identified affordable housing need within South Wiltshire. The Council seems content to reduce its projected provision of affordable units over the plan period from around 5,000 to around 4,000 on the basis that whatever delivery figure it opts for, it cannot "significantly impact" on affordability issues.
- 1.8 This represents a significant failure of long term planning; simply because the affordable housing problem cannot be resolved in its entirety is not a justification for not making every effort to build the affordable homes which are needed, consistent with environmental constraints. The South East Plan and the Core Strategy from 2009 successfully balance the maximisation of affordable houses with environmental constraints; it is not clear how the new Core Strategy achieves the same balance.
- 1.9 Given that the Council successfully balanced its growth projections with environmental constraints in its 2009 Core Strategy, using a detailed and comprehensive evidence base, it is unclear why it now considers that strategic sites which were judged to be acceptable in 2009 are no longer acceptable. Which aspect of the evidence base has changed for this different conclusion to be reached? If all of the strategic sites, including the site South of Netherhampton Road, were considered achievable in 2009, why is a contrary view now taken?
- 1.10 The result is that the revised Core Strategy is not in general conformity with the Regional Strategy, a point highlighted by the Inspector in his email of 21 June. The housing target contained in the Regional Strategy for the South West and the 2009 Core Strategy is derived from a strong evidence base; the evidence base underpinning the revised Core Strategy is weak in comparison.
- 1.11 The revised housing figure fails the soundness tests of being "justified" (not founded on a robust and credible evidence base) and "effective" (not flexible enough to cope with an economic upturn). The Core Strategy can be made sound by giving greater weight to the



emerging Regional Strategy to ensure general conformity with that Strategy. The housing figure contained in the Regional Strategy and the 2009 Core Strategy should be reinstated.